

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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April 27, 2020

By ECF

Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Earl Martin, 20 Cr. 136 (NRB)

Dear Judge Buchwald:

I write with the consent of the Government to request a 30-day adjournment of the conference scheduled for Thursday, May 7, 2020 in the above-referenced case. There have been no prior requests to adjourn a conference in this case. Due to the COVID-19 pandemic and the consequent Bureau of Prisons restrictions on attorney visitation and communication, I have had insufficient opportunity to discuss the substance of this case with my client, and he has had insufficient opportunity to review his electronic discovery inside the Metropolitan Correctional Center. An adjournment would also allow the parties to discuss the possibility of a pretrial resolution. The parties consent to the exclusion of time under the Speedy Trial Act through the next conference date scheduled by the Court.

Thank you for your consideration of this request.

Respectfully submitted,


/s/ Ariel Werner

Ariel Werner
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cc: David Robles, Assistant U.S. Attorney

The status conference currently scheduled for May 7, 2020 is adjourned until June 8, 2020 at 11:30 am. Speedy Trial time is excluded until June 8, 2020.

SO ORDERED.


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE